UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION REPORT

ENTERGY OPERATIONS, INC

QUALITY ASSURANCE PROGRAM CONSOLIDATION

ARKANSAS NUCLEAR ONE, UNITS 1 & 2

DOCKET NOS. 50-313 & 50-368

GRAND GULF NUCLEAR STATION

DOCKET NOS. 50-416

RIVER BEND STATION

DOCKET NOS. 50-458

WATERFORD 3 STEAM ELECTRIC STATION

DOCKET NOS. 50-382

1.0 INTRODUCTION

By letter dated April 30, 1998, Entergy Operations, Inc. (EOI), requested a Quality Assurance (QA) program change, characterized by the licensee as a reduction in commitment pursuant to 10 CFR 50.54(a)(3), to consolidate the four QA programs for Arkansas Nuclear One (ANO), Grand Gulf Nuclear Station (GGNS), River Bend Station (RBS) and Waterford 3 Steam Electric Station (W3) into a single Quality Assurance Program Manual (QAPM).

This revision was proposed to provide consistency in QA program implementation within EOI. The current four separate QA programs were initially developed during the design and construction phases for the units at each site and differ in a number of respects due to the various time frames in which they were developed, and also because of the different original licensees. The differences between the QA requirements at each site were duly considered by the licensee and resolved to arrive at a common and consistent set of QA controls. The result is that EOI has developed a common QAPM for use throughout EOI. In performing this consolidation, EOI has generated the proposed QAPM in conformance to the format of Standard Review Plan section 17.3, "Quality Assurance Program Description" (SRP 17.3).

In addition to several conference calls during the course of the staff review, meetings were held between the NRC and EOI staffs on July 2, August 27 and October 7, 1998, for coordination and resolution of staff questions including the need for additional information.

By letter dated October 26, 1998, the licensee submitted revised pages to the QAPM based on the results of the telephone conferences and meetings identified above. This safety evaluation report is based on the input received in the October 26, 1998, submittal.

2.0 EVALUATION PROCEDURE

EOI is currently committed to different QA program descriptions for each of the sites. While many of the specific QA requirements vary between the sites, each of the currently existing descriptions was at sometime previously submitted to the staff and found acceptable for meeting the requirements of 10 CFR Part 50, Appendix B. Very few of the changes in the proposed QAPM are considered to be reductions in commitments since most are consistent with existing statements in the current descriptions for at least one of the plants. In conducting this review, the staff compared the proposed standard QAPM against each of the existing descriptions, cited regulatory guides and endorsed standards, SRP 17.3 review criteria, other current staff positions, and 10 CFR Part 50, Appendix B requirements, and, if the staff review of the QAPM determined that a QA element was consistent with only one of the QA program description commitments, it was found acceptable in the QAPM for all sites.

3.0 FORMAT OF PRESENTATION

The QAPM follows the format of SRP 17.3, which, relative to SRP 17.2, "Quality Assurance During the Operations Phase", addresses the requirements of 10 CFR Part 50, Appendix B in a modified manner. The staff has found that although many specific QA element details included in the existing QAP descriptions do not appear in the consolidated QAPM, the basic commitments to implement these QA elements still remain by appropriate referencing of regulatory guides and the endorsed standards, citations of applicable regulations, and other existing requirements. In other words, duplication of commitments and requirements was minimized to the maximum extent possible by crediting the referenced material (i.e., Table 1 in the QAPM) to explain in many cases how the requirements of 10 CFR Part 50, Appendix B are satisfied. Site specific aspects, such as organization titles and arrangements, have been described in more general terms, with sufficient detail to ensure Appendix B requirements are met. In addition, some general requirements repeated throughout the existing descriptions have been combined into common statements that apply throughout the QAPM without exception (e.g., requirements for documented procedures and maintenance of records of QA activities). The end result is a less redundant and more generic type of QAPM format. The staff finds this is an acceptable approach for use in showing how the requirements of Appendix B are met. Specific issues which appeared to represent new approaches for meeting Appendix B requirements, or significant reductions in commitments for this group of plants as a whole are discussed below.

4.0 EVALUATION OF QA ELEMENTS

4.1 Organization

Unlike the current QAP descriptions, the licensee has chosen to not include an organizational chart to assist in describing the relationships of the various groups involved in performing the activities necessary for each plants' operation. Instead, a written description is provided that identifies the functional groups and the executives to whom they report. Managers for the functions of quality assurance, plant operations, plant modifications, training, records management, document control, corrective action, engineering, and materials, purchasing and contracts (procurement) are established who report to three executives responsible for overall

plant nuclear safety, operations support and engineering. These executives in turn report to the chief operating officer who reports to the chief executive officer. The functional managers may report through an additional layer of management, as yet undefined, and may be responsible for a single plant/location or for multiple plants/locations. Furthermore, these managers may fulfill more than one of the functions as listed above.

The quality assurance manager is assigned overall authority and responsibility for establishing, controlling, and verifying the implementation and adequacy of the QA program, and is given the capability to escalate QA matters directly to the chief executive officer when needed. If this position is assigned additional duties, they will be QA-related (e.g., corrective action). In addition, the QA manager is responsible for the inspection of all plant functional activities as described in documented procedures. While the personnel performing inspections are located organizationally within the various functional groups (i.e., peer inspectors), they report to the QA manager during their inspection activity and their qualifications to perform inspections are approved by the QA manager prior to initiation of the inspection activity (with the exception of personnel performing QA functions in the materials, purchasing, and contracts organization, see the SER section 4.2 "Procurement"). Inspectors are qualified in accordance with the requirements of ANSI N45.2.6 as endorsed by Regulatory Guide 1.58. Further, the assigned inspectors are not the personnel who performed the work being inspected. The adequacy of performance of inspection activities, as well as other QA activities, in accordance with the provisions of the QAPM is audited at least once every two years as part of the responsibilities of the QA manager.

The above described arrangements assure that adequate independence between the performing and verifying activities is maintained. In addition, we find that the licensee has provided an adequate description of the organization established to perform the various plant activities and of the QA functions performed by the QA manager to satisfy the requirements of 10 CFR Part 50, Appendix B.

4.2 Procurement

The manager responsible for materials, purchasing, and contracts, as described in section A.2.d.9 of the QAPM, is an offsite position reporting to the executive responsible for operations support (section A.2.c.2 of the QAPM). Reporting to this manager are six separate managers: managers responsible for materials, purchasing and contracts at each site, an offsite manager responsible for procurement, and an offsite manager responsible for supplier QA. The latter manager is assigned responsibility for QA-related functions in the procurement area such as supplier evaluations, source verifications, and receipt inspections, and is responsible for performing these functions in accordance with the provisions of the QAPM. Activities of personnel within this group are directed toward QA functions only; these personnel do not perform procurement functions as indicated in section B.1.b of the QAPM. This arrangement of a separate supplier QA group, located offsite, within the offsite materials, purchasing and contracts organization provides the necessary degree of independence of the QA function from the procurement function to satisfy the requirements of 10 CFR Part 50, Appendix B. Further, the manager responsible for quality assurance (section A.2.d.1 of the QAPM) is responsible for conducting oversight of these activities by performing periodic audits (at a frequency of at least every two years depending on performance experience) of the materials, purchasing and

contracts function and related QA functions. This arrangement satisfies the requirements of 10 CFR Part 50, Appendix B.

4.3 Grading of QA Requirements

Section A.1.c of the QAPM indicates that the quality assurance elements described in the QAPM are applied to safety related structures, systems and components and activities to an extent commensurate with their importance to safety. The licensee has stated that the requirements of the QAPM will be applied to all such items and activities but the method of implementation will be graded commensurate with importance to safety. It is understood that identification of the items and activities subject to such grading will be determined by engineering evaluation and analysis based on experience and knowledge of the safety contribution of the item or activity. This approach is acceptable under 10 CFR Part 50, Appendix B.

4.4 Procedures

Procedures that implement the requirements of the QAPM are prepared by the personnel in the functional area to which the procedures apply. The procedures include quality requirements and are approved by the manager of the functional area. Personnel performing these activities are qualified in accordance with the requirements of ANSI/ANS 3.1-1978 and the requirements of the applicable unit's Technical Specifications. The QA manager is responsible for auditing the adequacy of the procedures to assure that the QA requirements in the QAPM are properly implemented. This arrangement meets the requirements of 10 CFR Part 50, Appendix B.

4.5 Auditing

The manager of quality assurance is responsible for the performance of audits of the following areas at least once every two years, or more frequently as performance indicators dictate: conformance of each unit's operation to its Technical Specifications; performance of activities required by the QAPM to meet 10 CFR Part 50, Appendix B; performance, training, and qualifications of the entire plant staff; results of actions taken to correct deficiencies occurring in the structures, systems, and components, or method of operation for each unit that affect safety; offsite dose calculations manual and process control program; and the radiological environmental monitoring program. Audits are performed in accordance with approved written procedures or checklists and other requirements consistent with the commitments in Table 1 of the QAPM with regard to the provisions of Regulatory Guides 1.144 and 1.146 and the endorsed standards ANSI/ASME N45.2.12 and N45.2.23, and the results are distributed to the appropriate levels of management for review. The commitment to conduct the above described audits satisfies the requirements of 10 CFR Part 50, Appendix B.

4.6 Corrective Action

The QAPM commits to implement a corrective action program that includes prompt identification, documentation, and correction of conditions adverse to quality. The program requires a determination of cause (when possible) for significant conditions adverse to quality and corrective action steps that are directed toward lessening the likelihood of recurrence. All

personnel are responsible for promptly identifying and reporting conditions adverse to quality. Reports of conditions adverse to quality are analyzed to identify trends in quality performance and significant results are provided to appropriate levels of management. The licensee's commitments for the corrective action program are consistent with the provisions of Regulatory Guide 1.33 and endorsed standard ANSI/ASME N45.2 (See Table 1 of the QAPM) and satisfy the requirements of 10 CFR Part 50, Appendix B.

4.7 Applicability of the QAPM to Radioactive Material

Section A.1.c of the QAPM states that the QAPM is applicable to all activities associated with structures, systems, and components used for storage of spent nuclear fuel or high-level radioactive waste that are safety related or controlled by 10 CFR Part 72. In addition, the QAPM is applicable to transportation packages for radioactive material controlled by 10 CFR Part 71. The QAPM, in conjunction with each plant's Quality Assurance Program Approval for Radioactive Material Packages and other license requirements which are not changed by this submittal, implements the QA requirements under those regulations and is acceptable.

4.8 Independent Safety Engineering Group (ISEG)

The four licensees' present commitments for the ISEG function is varied with regard to performing the function, location of its description in licensing documentation, and the applicable regulatory control for changes. The ISEG function is addressed in the current QA program description for Waterford 3 only, and the control of changes therefore falls under 10 CFR 50.54(a). For the Grand Gulf and River Bend plants, the ISEG function is addressed in their respective FSARs with change control provided under 10 CFR 50.59. The Arkansas Nuclear One plant is not committed to conducting the ISEG function at all since ISEG was made applicable only to plants licensed subsequent to the TMI event (See NUREG-0737, Section I.B.1.2, "Independent Safety Engineering Group"). The licensee indicated its intent to not include the ISEG function in the QAPM since the QAPM is directed toward meeting the requirements of 10 CFR Part 50, Appendix B and these requirements do not include ISEG; the licensee proposed to provide a discussion of the ISEG function in each plant's FSAR, as applicable, with change control falling under 10 CFR 50.59. The staff found this approach to be acceptable providing the QAPM included a statement that the ISEG function, as applicable, would be continued and any change to that commitment would need to be addressed under the provisions of 10 CFR 50.54(a). The licensee included its commitment to continue the ISEG function by adding Section D., "Independent Safety Review" to the QAPM. The staff's evaluation has found the licensee's approach to be acceptable.

4.9 Supplementary Regulatory Commitments (Table 1)

As stated above, the proposed consolidated QAPM places a greater emphasis on the licensee's commitments to regulatory guides and the endorsed standards due to removing duplication of such material from the body of the QAPM. Table 1, "Regulatory Commitments" in the QAPM was reviewed against existing commitments to regulatory guides and standards for each of the plants. Most items were fully consistent with existing commitments at the plants, industry standards, other regulatory requirements and/or current staff positions, and have been found acceptable for this QAPM on that basis. Items from Table 1 which required further

evaluation because they appeared to represent a new position or represented a significant reduction in commitment at one or more of the plants are discussed below:

4.9.1 Regulatory Guide 1.8, Rev 1, September 1975, Item 1, General, First Paragraph

"Qualification requirements for personnel will meet ANSI/ANS 3.1-1978 except where exception to ANSI N18.1 or to this Standard is identified in the applicable unit's Technical Specifications."

Currently, commitments for the four plants range from ANSI 18.1-1971 to ANSI/ANS 3.1-1981 and combinations of these standards. Changing to the above commitment for all of the plants would result in some small reductions in commitment in some areas for some plants and increases in some commitments for others. For example, the total experience and nature of experience required for positions vary between these standards. As one specific example of the nature of these differences, technical managers as required by ANSI 18.1-1971 must have eight years experience in responsible positions with at least one year being nuclear power plant experience, by ANSI/ANS 3.1-1978 must have eight years in responsible positions related to power generation with three years of which being nuclear power plant experience, and by ANSI/ANS 3.1-1981 must have four years experience in responsible positions related to power generation of which three years shall be nuclear power plant experience. Therefore, due to the nature of the differences between these standards, the benefits of standardizing this commitment outweigh any small reductions in experience level in some areas at some plants. In addition, more restrictive requirements are still in place in Technical Specifications, and other regulations where appropriate (e.g. licensed operator qualifications). Therefore, the staff finds that the above change is acceptable and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.2 Regulatory Guide 1.8, Rev 1, September 1975, Item 1, General, Second Paragraph

"Individuals filling positions who met the previous commitment at the time of implementation of this commitment can be considered to meet any more restrictive aspects of the requirements of this commitment for that position without further review and documentation."

This clarification was added because some positions at some plants may have additional qualification requirements added as result of the consolidated QAPM change. It is included as a "Grandfather Clause" to allow those incumbents who are currently qualified under existing commitments to remain fully qualified for their positions when the new requirements are implemented. The staff finds this is acceptable as the licensee is voluntarily upgrading its commitments, the incumbents remain qualified to perform their jobs, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.3 Regulatory Guide 1.8, Rev 1, September 1975, Item 2, General

"The following qualifications may be considered equivalent to a bachelor's degree:

a. 4 years of post secondary schooling in science or engineering,

b. 4 years of applied experience at a nuclear facility in the area for which qualification is sought,
c. 4 years of operational or technical experience/training in nuclear power, or
d. any combination of the above totaling 4 years.

Years of experience used to meet the education requirements as allowed by this exception shall not be used to also meet the experience requirements."

This is consistent with an existing clarification in the GGNS QA program description. In addition, Section 4.1 of ANS 3.1 recognizes that a combination of education, experience and skills commensurate with functional responsibilities are used to provide reasonable assurance that decisions and actions will be such that the plant is operated in a safe manner. The clarification here provides a specific list of criteria which is applicable for EOI. Through NRC and EOI staff discussions, the additional clarifications were added to ensure that formal schooling will be post-secondary schooling, and that experience used to meet degree requirements will not be double counted when experience requirements are also specified for a position. Given the consistency with the existing GGNS exception, the consistency with the standard, and the additional clarification added, the staff finds that this is acceptable and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.4 Regulatory Guide 1.33, Rev 2, February 1978, Item 3, ANSI N18.7 Section 1

"Sentences 4 and 5 state, 'However, applicable sections of this standard should be used as they apply to related activities. Activities included are: Design Changes, Purchasing, Fabricating...' With regard to radioactive material transportation activities, Entergy will only implement the requirements associated with those activities conducted in accordance with the applicable NRC Quality Assurance Program Approval for Radioactive Material Packages."

This is consistent with the intent of an existing exception/clarification in the QA program description for GGNS which states "The licensee does not intend to fabricate, design, assemble, or modify any NRC licensed container to be used to transport radioactive materials." The referenced NRC QA Program Approval for Radioactive Material Packages provides additional restrictions on the activities the licensee can perform similar to the original GGNS exception. Each plant has a separate NRC QA Program Approval for Radioactive Material Packages. These approvals describe activities conducted with regards to transportation packaging under the applicable criteria of Appendix B to 10 CFR Part 50 (e.g procurement, maintenance, repair, and use). The approvals also specify that all other activities (e.g. design, fabrication, assembly, and modification) shall be satisfied by obtaining certifications from packaging suppliers that these activities were conducted in accordance with an NRC-approved QA program. Applicable quality requirements of 10 CFR Part 71 provide additional requirements with regards to packaging and transportation of radioactive materials. Given the consistency with an existing exception and the reference to the NRC QA Program Approval for Radioactive Material Packages which defines activities which are and are not applicable, the staff finds the above exception acceptable.

4.9.5 Regulatory Guide 1.33, Rev 2, February 1978, Item 13, ANSI N18.7 Section 5.2.2

"The person who holds a senior reactor operators license for the affected unit and approves a temporary change to a procedure is not required to be in charge of the shift."

The revised requirement provides sufficient control to ensure involvement of knowledgeable operations personnel while allowing for the workload of on-shift personnel to be controlled. Section B.14.a. of the QAPM requires that a process is in place to ensure that all personnel, including the SRO in charge of the shift and others, use the correct procedures including those which have been temporarily changed. The staff finds that this is acceptable and that the requirements of Appendix B will continue to be met.

4.9.6 Regulatory Guide 1.33, Rev 2, February 1978, Item 16, ANSI N18.7 Section 5.2.6

"The requirement of the fifth paragraph of this section to have a log of the status of temporary modifications is not applicable to temporary modifications for routine tasks installed in accordance with procedures. These procedures shall provide assurance that approvals are obtained, temporary modification activities are independently verified by an individual cognizant of the purpose and the effect of the temporary modification, and that activities are adequately documented to indicate the status of the temporary modification."

This is consistent with the current QA program description approved by the NRC for ANO. The staff finds that this is acceptable in that it provides an equivalent level of control for these activities, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.7 Regulatory Guide 1.30, August 1972, Item 2, ANSI N45.2.4 Section 2.5.2 and Regulatory Guide 1.33, Rev 2, February 1978, Item 24, ANSI N18.7 Section 5.2.16, Sentence 2 of Paragraph 3

"The third sentence of this section states in part "...equipment shall be suitably marked to indicate date of next required calibration." (first reference)
"Sentence 2 of paragraph 3 states "Records shall be made and equipment suitably marked to indicate calibration status." (second reference)

The clarifications for these items were proposed in the original submittal and were consistent with a current QAP clarification approved by the NRC for River Bend. However, these clarifications have been removed from the final QAPM submittal since they are unnecessary. The original intent of the clarification was to allow other methods of marking equipment with calibration information other than by tagging. The staff has recognized and approved alternative methods before, such as utilizing a calibration log that is correlated with the equipment by unique identification numbers on the equipment. In reviewing this issue, it was recognized that the above standard references themselves do not specify the methods for making records or the details of how to suitably mark the equipment to indicate the calibration status. Therefore, the staff agrees that this clarification is not necessary and can be removed. In addition, a clarification to ANSI N45.2.4 Section 6.2.1 in the QAPM requires that equipment be suitably marked to indicate the date of the next required calibration and the identity of the

person that performed the calibration. The staff finds that alternatives to tagging equipment with calibration information are acceptable provided that the specific method implemented by the licensee meets the requirements of the above standards as committed to in the QAPM, and finds that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.8 Regulatory Guide 1.37, March 1973, Item 3, Section C.4

"As an alternative to the requirements of this section, contamination levels in expendable products may be based upon safe practices and industry availability with documented engineering evaluations. Contamination levels are controlled such that subsequent removal by standard cleaning methods results in the achievement of final acceptable levels which are not detrimental to the materials.

This exception is based on the current QA programs approved by the NRC for GGNS and RBS. However, these exceptions contained additional specific wording regarding the materials involved which was not included in EOI's original submittal. Following discussions of these differences among NRC and EOI staffs, the final exception was modified to address the staff's concern. Based on this alternative, the requirements of the regulatory guide provisions still apply unless there is a documented engineering evaluation of the alternative used for a particular application. The staff finds that this maintains an acceptable level of control to ensure that contamination levels in expendable products are appropriately controlled, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.9 Regulatory Guide 1.38, Rev 2, May 1977, Item 25, ANSI N45.2.2 App (A-3) Section A.3.9

"The last paragraph of A.3.9 could be interpreted as prohibiting any Appendix (A-3) direct marking on bare austenitic stainless steel and nickel alloy Section A.3.9 metal surfaces. As an alternate, paragraphs A.3.9. (1) and (2) may be used to control marking on the surface of austenitic stainless steels and nickel base alloys based on documented engineering evaluations. Contamination levels are controlled such that the material used for marking is not detrimental to the materials marked."

This exception is based on the current acceptable QA program description for ANO. However, the ANO exception contained additional specific wording regarding the materials involved which was not included in the original EOI submittal. Following discussions of these differences among NRC and EOI staffs, the final exception was modified to address the staff's concern that a documented engineering evaluation of the alternative used for a particular application is needed. The staff finds that this maintains an acceptable level of control to ensure that markings on materials are appropriately controlled, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.10 Regulatory Guide 1.88, Rev 2, October 1977, Item 5, ANSI N45.2.9 Section 5.4.3

"Instead of the requirements of this section, Entergy will comply with the following: Provisions shall be made for special processed records such as radiographs, photographs, negatives, microfilm, and magnetic media to prevent damage from

excessive light, stacking, electromagnetic fields, temperature, and humidity as appropriate to the record type with appropriate consideration of packaging and storing recommendations as provided by the manufacturer of these materials."

An exception containing much of the above information for this item was in the QA program description for GGNS. However, following discussions among NRC and EOI staffs, it seemed appropriate to include the following aspect "...with appropriate consideration of packaging and storing recommendations as provided by the manufacturer of these materials." This will help ensure that the requirement from the original standard regarding storage as recommended by the manufacturer is at least considered when appropriate. The staff finds that this provides adequate control and consistency with the intent of the standard, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.11 Regulatory Guide 1.123, Rev 1, July 1977, Item 8, ANSI N45.2.13 Section 8.2 Item b

"Non-conformance notices for conditions described in this section are only required to be submitted to Entergy when the non-conformance could adversely affect the end use of an item relative to safety, interchangeability, operability, reliability, integrity or maintainability."

This is consistent with an exception in the QA program description for GGNS. Elsewhere in the QAPM are requirements related to the ability of suppliers to make the determinations described above (e.g., see QAPM section B.4, "Procurement Control"). The staff finds that this exception in conjunction with other procurement controls contained in the QAPM provide adequate assurance that non-conformance notices will be submitted to EOI as appropriate, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

4.9.12 Regulatory Guide 1.146, Rev 0, August 1980, Item 2, ANSI N45.2.23 Section 2.3.4

"Prospective lead auditors shall demonstrate their ability to effectively implement the audit process and lead an audit team. They shall have participated in at least one audit within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively lead audits, licensee management may designate a prospective lead auditor as a lead auditor."

The concept of demonstration of skills for lead auditors was previously approved by the staff for other licensees. This exception is basically consistent with the previous staff position except that a requirement to have documentation and procedures for this process is not specifically included. However, these items are covered generically for all QAPM subjects by section A.1.d. of the QAPM and specifically by section 2.3 of ANSI/ASME N45.2.23-1978. Therefore, the staff finds the above exception to be consistent with current positions regarding lead auditor qualification, and that the requirements of 10 CFR Part 50, Appendix B will continue to be met.

5.0 CONCLUSIONS

Based on the staff's evaluation of the licensee's proposed QAPM, it has been determined that the requested QA program change to consolidate the four existing QA programs for Arkansas

Nuclear One (ANO), Grand Gulf Nuclear Station (GGNS), River Bend Station (RBS) and Waterford 3 Steam Electric Station (W3) into a single QA program is acceptable. The staff review compared the current commitments contained in the four existing QA program descriptions relative to the consolidated QAPM. The staff further examined the consolidated QAPM with respect to requirements of 10 CFR Part 50, Appendix B and the review criteria contained in SRP Section 17.3 and determined that all regulatory requirements have been satisfied. It is concluded that the proposed QAPM will continue to meet the requirements of 10 CFR Part 50, Appendix B. It is understood that any required technical specification changes, changes to implementing procedures, and other changes which may be required as a result of this QAPM consolidation will be accomplished in accordance with applicable requirements prior to implementation of this program.

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